

IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE

FILED

2011 MAR 24 PM 3:20

CLERK & MASTER  
DAVIDSON CO. CHANCERY CT.

Case No. 11-404-T

BELLE MEADE TOWER  
CONDOMINIUM ASSOCIATION,  
Plaintiff,

vs.

BRUCE C. ROBINS, ROBINS  
INSURANCE AGENCY, INC., and  
TRAVELERS INSURANCE COMPANY,  
Defendants.

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COMPLAINT

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COMES NOW the Plaintiff, Belle Meade Tower Condominium Association, and for its complaint against Bruce C. Robins, Robins Insurance Agency, Inc. and Travelers Insurance Company, say and allege:

PARTIES

1. Plaintiff, Belle Meade Tower Condominium Association (hereinafter the "Association"), is a Tennessee unincorporated association formed for the purpose, *inter alia*, of operating, managing, maintaining and administering the affairs of Belle Meade Tower, a condominium, located in Davidson County, Tennessee (hereinafter the "Condominium"). Its members are comprised of the co-owners of residential units within the Condominium, which is a residential condominium complex located at 105 Leake Avenue, Nashville, Davidson County, Tennessee, 37205.

2. Robins Insurance Agency, Inc. is a Tennessee corporation with its principal place of business in Nashville, Davidson County, Tennessee. Robins Insurance Agency, Inc. may be

EXHIBIT

A

served with process through its registered agent, Bruce C. Robins, located at 30 Burton Hills Blvd, Nashville, TN 37215.

3. Bruce C. Robins is the President of Robins Insurance Agency, Inc. and is a licensed insurance provider in the State of Tennessee. Bruce C. Robins and Robins Insurance Agency, Inc. are hereinafter collectively referred to as "Robins". Bruce C. Robins may be served with process at 30 Burton Hills Blvd, Nashville, TN 37215.

4. Travelers Insurance Company (hereinafter "Travelers") is an insurance company which issued flood insurance to the Association insuring the Condominium. Travelers may be served with process through its registered agent, the Department of Commerce and Insurance – Commissioner, located at 500 James Robertson Parkway, 5<sup>th</sup> Floor, Nashville, TN 37243.

#### **JURISDICTION AND VENUE**

5. This Court has jurisdiction over this dispute and the parties. The acts, practices, and conduct complained of occurred in Davidson County, Tennessee and thus venue lies in this Court.

#### **FACTS**

##### **The Insurance Policy**

6. In 2004, the Association contacted Robins in order to secure a flood insurance policy for the Condominium.

7. Robins developed, recommended, negotiated and procured a Standard Flood Insurance Policy ("SFIP") for the Association issued through Travelers. The policy procured by Robins was policy number 6004976756 (hereinafter the "Original Policy") and is attached hereto as Exhibit 1.

8. The policy developed, recommended, negotiated and procured by Robins

provided for \$500,000.00 in building insurance coverage and \$10,000.00 in content insurance coverage.

9. The Original Policy was renewed annually without issue up to and after the historic May 2010 Flood (the "Flood") that occurred in Davidson and surrounding counties in Tennessee.

#### **The May 2010 Flood**

10. The Flood caused hundreds of thousands of dollars of damage to the Condominium and to its residents. The damages affected all of the residents and forced them to go without the use of hot water, heat, the guest rooms and the elevators in their building.

11. As of February 18, 2011, Plaintiff's losses associated with the Flood at the Condominium are \$754,013.77.

12. On May 3, 2010, the Association notified Robins that the Condominium had sustained severe damage as a result of the Flood.

#### **Events After the Flood**

13. On July 7, 2010, Robins notified the Association that the Original Policy had been incorrectly written on a General Property Form SFIP which provided no coverage for the Condominium.

14. Page 1 of the General Property Form SFIP states that the policy provides no coverage for a residential condominium building. Page 3 of the Residential Condominium Building Association Policy form (hereinafter "RCBAP") states that the policy covers only a residential condominium building in a regular program community. Thus, the Original Policy should have been written on a RCBAP form.

15. On or about July 15, 2010, Robins wrote Travelers and stated that the full policy

limit of the Original Policy should be paid immediately to the Association. Robins confirmed that the Association had purchased the policy in good faith and renewed it continuously for six years. A copy of the July 15, 2010 letter is attached hereto as Exhibit 2.

16. On or about August 30, 2010, Travelers advised the Association that it had cancelled the Original Policy and stated that the cancellation occurred because a General Property Form cannot be used to insure a residential condominium building. A copy of the August 30, 2010 letter is attached hereto as Exhibit 3. The Flood General Policy Cancellation of the Original Policy for the 05/07/2010 to 05/07/2011 policy period, cancellation effective 05/07/2009, is attached hereto as Exhibit 4.

17. On August 30, 2010, Travelers also advised the Association that a rewritten policy using the correct RCBAP form had been issued for the Association. The second policy, written for the 05/07/2009 to 05/07/2010 and 05/07/2010 to 05/07/2011 policy periods, is policy number 6010243059 (collectively hereinafter the "Second Policy") and is attached hereto as Exhibit 5.

18. In accordance with the Federal Emergency Management Agency (hereinafter "FEMA") requirements, the coverage was rewritten to match the amount of coverage that was originally requested for the Condominium. Therefore, the Second Policy once again provided for \$500,000.00 in building insurance coverage and \$10,000.00 in contents coverage.

19. The Association did not request the cancelation of the Original Policy. The coverage terms of the Second Policy were never discussed with the Association.

20. On September 16, 2010, the Association submitted their Proof of Loss ("Proof of Loss") for flood damage to the Condominium in the amount of \$746,958.12.

21. On September 30, 2010, Travelers issued their denial letter and rejected the

Association's claim.

22. As stated in the denial letter, Travelers had determined that the Second Policy allowed them to issue payment of \$525,743.65 for the damages sustained by the Condominium. However, the Association was heavily penalized under the Coinsurance section for only maintaining \$500,000.00 in building insurance coverage and the final amount declared payable by Travelers, after taking the penalty and deductible into account, was \$33,285.41.

23. On October 11, 2010, the Association appealed the denial of the Proof of Loss to FEMA.

24. On January 18, 2011, FEMA denied the Association's appeal stating that Robins had purchased the wrong policy for the Association and had failed to provide the information needed to properly issue the appropriate policy.

### COUNT I

#### Failure to Procure – Robins

25. Plaintiff incorporates by reference paragraphs 1-24 as if set forth fully herein.

26. As the Association's broker of record, Robins had a duty as a matter of law to perform services for the Association using the skill and judgment required by professionals in Robins' business and the Association relied on Robins to do so.

27. The Association understood and expected that the policy developed, recommended, negotiated and procured by Robins for the Association was the required coverage necessary to protect the Condominium in the event of a flood.

28. The Association understood and expected that the \$500,000.00 in building coverage and \$10,000.00 in content developed, recommended, negotiated and procured by Robins for the Association was the coverage required to protect the Condominium in the event of

a flood.

29. Plaintiff relied on the express representations by Robins that their policy would provide the necessary coverage to protect the Condominium in the event of a flood.

30. Plaintiff further relied on the express representations by Robins that \$500,000.00 in building coverage and \$10,000.00 in content coverage was the required coverage necessary to protect the Condominium in the event of a flood.

31. The Original Policy was cancelled and the Association was not properly insured for the damages caused by the Flood. Furthermore, as noted by the Coinsurance penalty, the coverage amounts selected by Robins were inadequate for purposes of insuring the Condominium. Therefore, Robins failed to develop, recommend, negotiate and/or procure flood insurance for the Association as directed.

32. Robins is liable to Plaintiff for Plaintiff's losses associated with the Flood.

## COUNT II

### Negligent Misrepresentation – Robins and/or Travelers

33. Plaintiff incorporates by reference paragraphs 1-32 as if set forth fully herein.

34. Robins had a duty as a matter of law to perform services for the Association using the skill and judgment required by professionals in Robins' business. Travelers had a duty to accurately represent the coverage afforded by the policy.

35. The Association understood and expected that the insurance developed, recommended, negotiated and procured by Defendants for the Association would provide the required coverage necessary to protect the Condominium in the event of a flood.

36. The Association purchased the flood insurance from Travelers, based on the recommendation and advice of the Defendants.

37. Plaintiff relied on the express representations by Defendants that the Original Policy would provide the necessary coverage to protect the Condominium in the event of a flood.

38. Plaintiff further relied on the express representations by Defendants that \$500,000.00 in building coverage and \$10,000.00 in content coverage was the required coverage necessary to protect the Condominium in the event of a flood.

39. The Original Policy developed, recommended, negotiated and procured by Defendants did not provide coverage for a residential condominium building and was canceled for this reason after the Flood.

40. To date, Plaintiff's losses associated with the Flood are \$754,013.77.

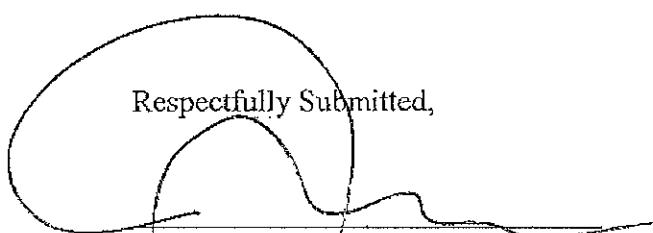
41. Defendants negligently misrepresented to the Plaintiff that this flood policy would protect the Condominium in the event of a flood, and sold Plaintiff that insurance, which in fact would not protect the Condominium in the event of a flood.

42. Defendants are liable to Plaintiff for Plaintiff's losses associated with the May Flood and/or Defendants breached their duty not to misrepresent the coverage afforded by the policy.

WHEREFORE, premises considered, Plaintiff requests the following relief:

1. That proper process issue and be served upon the Defendants and that the Defendants be required to answer this Complaint;
2. Judgment in Plaintiff's favor against Robins in an amount to be proven at trial sufficient to compensate Plaintiff for their losses and damages caused by Robins' failure to procure flood insurance as directed;
3. Judgment in Plaintiff's favor against Travelers and Robins in an amount to be proven at trial sufficient to compensate Plaintiff for their losses and damages caused by Travelers and Robins' negligent misrepresentations;
4. That Plaintiff be awarded costs and reasonable attorney's fees against the Defendants;
5. That Plaintiff be awarded pre-judgment and post-judgment interest;
6. That all costs of this action be taxed to the Defendants; and
7. For any and all other such relief either in law or equity as the Court may deem just and appropriate.

Respectfully Submitted,



J. David Wicker, Jr. No. 23960  
W. Lee Corbett, P.C. No. 2554  
CORBETT CROCKETT  
3100 West End Avenue, Suite 1050  
Nashville, Tennessee 37203  
(615) 383-0500

Attorneys for the Plaintiff



## WYTRŚRIF

01 OF 01

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BELLE MEADE CONDO ASSOCIATION

105 LEAKE AVE  
NASHVILLE TN 37205-3710

**THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ CAREFULLY.**

**STANDARD FLOOD INSURANCE POLICY**

**ENDORSEMENT**

**Effective May 1, 2003**

**This Endorsement replaces Paragraph 2, Coverage D - Increased Cost of Compliance, III - Property Covered of the Dwelling, General Property, and Residential Condominium Building Association Policies with the following paragraph.**

**2. Limit of Liability**

We will pay you up to \$30,000 under this Coverage D - Increased Cost of Compliance, which only applies to policies with building coverage (Coverage A). Our payment of claims under Coverage D is in addition to the amount of coverage which you selected on the application and which appears on the Declarations Page.

But the maximum you can collect under this policy for both Coverage A - Building property and Coverage D - Increased Cost of Compliance cannot exceed the maximum permitted under the Act. We do not charge a separate deductible for a claim under Coverage D.



## Robins Insurance Agency, Inc.



30 Burton Hills Blvd. • Suite 300 • P.O. Box 150437 • Nashville, TN 37215  
Phone: (615) 665-9200 • Fax: (615) 665-9207 • E-mail: [insurance@robinsins.com](mailto:insurance@robinsins.com) • [www.robinsins.com](http://www.robinsins.com)

July 15, 2010

Ms. Jacki Stockton  
Ms. Beth Williams  
Travelers Insurance Company

Re: Belle Meade Tower Condo Association

Dear Jacki and Beth:

The full policy limit of \$500,000 for this flood claim should be paid immediately, and I will explain this clearly. The estimated damages exceed \$700,000.

The questions raised concerning our use of the non residential policy form and the policy provisions on page 12 of the policy regarding reformation of coverage are not relevant to the need for swift resolution on behalf of our client.

The engineering report due you next week will simply determine if we used the wrong policy form back in early 2004. After our numerous conversations this week directly with FEMA and CSC, I have no idea what the answer might be.

But, suppose the report indicates we should have used a different policy form, then you must go to page 12 for reformation. The policy clearly does not address this situation no matter how many times you may read it over and over.

After you remit to our client the \$500,000, you can recalculate the difference in what the settlement would have been under the other policy form with coinsurance provisions, and come to my agency for the difference. Our E & O carrier will not have a problem defending us, but that is another matter for another day.

You cannot alter the policy issued and renewed for six years continuously when there was no change in the risk. Neither Travelers nor FEMA can get away with that. Nothing on page 12 or anywhere else in the policy allows you to amend the policy provisions.

The engineering report and all the conversations with all the people at CSC and Travelers is an exercise in CYA, which I can appreciate in a large organization. But, it is time to take responsibility and get this claim paid now.



Belle Meade Tower purchased a policy in good faith and I stand behind them all the way. If Travelers or FEMA think our agency made any mistakes, then the process allows us to settle that separately from the payment to our client.

Let's do the right thing and settle this today. Please call me promptly upon your review. Thank you.

Sincerely,  
Robins Insurance Agency, Inc.



Bruce C. Robins, CPCU, ARM, CIC  
President



Chantal Cyr

Vice President  
Travelers

(860)756-1840 (phone)  
(800)382-6235 (fax)

One Tower Square, 9PBA  
Hartford, CT 06183

August 30, 2010

Robins Insurance Agency  
Attention: Bruce C. Robins, President  
30 Burton Hills Blvd.  
Suite 300  
Nashville, Tennessee 37215

RE: Belle Meade Condominium Association  
Policy Number: 6004976756  
Date of Loss: 5/2/2010

Bruce,

Given the complexities and series of events that have occurred relating to the flood insurance claim made by Belle Meade Condominium under their Standard Flood Insurance Policy, we are providing you with this summary.

The Standard Fire Insurance Company "Standard Fire" is a Write Your Own "WYO" insurer in the federal government's National Flood Insurance Program "NFIP" and as such, is the Fiscal Agent of the federal government. The NFIP's Standard Flood Insurance Policy, which is federal regulation, and all disputes arising from the handling of any claim under such policy are governed exclusively by the flood insurance regulations promulgated by FEMA, the National Flood Insurance Act of 1968, as amended (42 U.S.C., et seq.) and Federal Common Law. This is important to note because Standard Fire, like all other WYO insurers are bound by the requirements imposed on it by FEMA. Standard Fire does not draft the insurance contract nor does it create the rules of implementation rather, Standard Fire must, by contractual obligation and as the Fiscal Agent of the government, strictly adhere to the SFIP and rules imposed on it by FEMA.

When Standard Fire received the insurance application for Belle Meade, the application stated the building was nonresidential and the estimated replacement cost was \$500,000. Based upon this information a Standard Flood Insurance Program General Property Policy was issued pursuant to the NFIP. This policy also provided coverage for association-owned personal property in the amount of \$10,000.



Standard Fire received notice of the flood loss that occurred on 5/2/2010. It was not until after Belle Meade suffered a loss on 5/2/2010 did Standard Fire know that the information relied upon by it to rate and issue the policy was incorrect. This occurred when Standard Fire sent an independent adjuster to the location to assess the damages. Upon inspection, the independent adjuster determined the property was actually one building which was a residential condominium with 10 floors devoted to residential units and an attached parking garage. Because the agent, Bruce Robins disagreed with this decision and because there would be an enormous impact on the claim, Standard Fire sent out an engineer to the location to see if there was any way to consider this building anything other than a residential condominium. The engineer came up with the same result.

Under the NFIP, a General Property Policy cannot be used to insure a residential condominium building. Because the incorrect information was identified only after a loss was filed, the policy provides for reformation to the correct policy form, here it would be a Residential Condominium Building Association Policy (RCBAP). The rules of the NFIP require us to cancel the existing policy and apply those premiums to re-write the coverage to the correct policy form at the same limits as the expiring policy for the current year and the prior year term. Standard Fire is not allowed under the rules of the program to use any overpayments in premium to purchase additional insurance to reduce the co-insurance penalty.

Because Standard Fire is not able to deviate from the rules of the NFIP, Standard Fire presented a request to FEMA to waive provisions of the SFIP so that the insured could receive an amount closer to the \$500,000. FEMA denied our waiver request. As a follow up, FEMA has stated if the insured requests, FEMA will consider reformation of the policy back 6 years, beyond the current and prior year reformation outlined above. This would result in a possible additional premium refund for those years.

The current and prior year policy reformation has occurred and the current and prior term premium has been refunded to the customer. The claim has been adjusted, however, we have not yet received a signed and sworn proof of loss from the insured. The insured may submit their own signed and sworn proof and Standard Fire can pay the undisputed amount on that proof of loss or, the insured can sign one prepared by the independent adjuster. Regardless of who prepares the proof, in accordance with the SFIP, a proof of loss is required in order for any claim to be paid under the NFIP. Because we are now beyond the timeframe for submitting the proof under the program rules, we will submit a waiver request to FEMA on behalf of the policyholder. Given the current posture of this dispute, please submit that Proof to Standard Fire's counsel via counsel representing the condo association.

Among other options and rights available to the insured is the right to seek an appeal of any FEMA waiver denial directly through FEMA. We would also suggest that you provide council

to your client with respect to this policy and the limits that are necessary to provide them with adequate coverage in the future.

Respectfully,

Chantal M Cyr



Insurer: The Standard Fire Insurance Company  
Flood Service Center PO Box 29103  
Shawnee Mission, KS 66201-1403

Policy Number  
6004976756

### FLOOD GENERAL POLICY CANCELLATION

Named Insured and Mailing Address:  <b>BELLE MEADE CONDO ASSOCIATION 105 LEAKE AVE NASHVILLE, TN 37205-3710</b>	Policy Period: <b>05/07/2010 to 05/07/2011</b> Policy Term: <b>ONE YEAR</b> <b>CANCELLATION EFFECTIVE: 05/07/2009</b>
	Agent No: <b>0F5881</b> <b>ROBINS INSURANCE AGENCY INC PO BOX 150437 NASHVILLE, TN 37215</b> Agent Phone: <b>615-665-9200</b>
Payor: <b>INSURED</b>	

The building covered by this policy is located at the above mailing address unless otherwise stated below.

RATING DESCRIPTION	
Property/Building	Contents Location
<b>NON-RESIDENTIAL THREE OR MORE FLOORS NO BASEMENT</b>	<b>LOWEST FLOOR ONLY ABOVE GROUND LEVEL Subject to, III. Property Covered, Paragraph B.</b>

Date of construction or substantial improvement was on **01/01/1965**

LOCATION INFORMATION
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Community Name: **NASHVILLE & DAVIDSON COUNTY, CITY OF\*** No: **4700400326F**

Status: **REGULAR** CRS Class: **8** FIRM Zone: **AE** Elevation Difference: **Grandfathered:**

COVERAGE AND RATING INFORMATION					
Coverage Type	Coverage Limit	Deductible	Rate	Deductible Adjustment	Premium
Building	\$ 500,000	\$10,000	00.83/01.13	\$ -743.00	\$ 4,383.00
Contents	\$ 10,000	\$10,000	01.62/01.01	\$ -23.00	\$ 139.00
ICC PREMIUM					\$ 60.00
FEDERAL POLICY FEE					\$ -75.00
PREMIUM REFUND					\$ -7,963.00
TOTAL PREMIUM					\$ -7,963.00

THIS IS NOT A BILL

Policy Changes:

**CANCELLATION - 22. CANCEL/REWRITE DUE TO**

Attachments:

#### FIRST MORTGAGEE

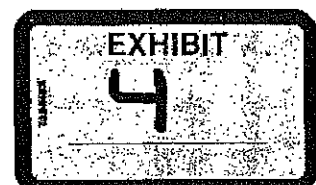
SUNTRUST MORTGAGE INC ISAOA  
PO BOX 57028  
IRVINE, CA 92619-7028  
LOAN NUMBER: 0021729504

Issue Date: **07/28/2010**

Insured Copy

Your Insurer is The Standard Fire Insurance Company, One Tower Square, Hartford, CT 06183

For information about how Travelers compensates independent agents and brokers, please visit [www.Travelers.com](http://www.Travelers.com) or call our toll free telephone number 1-866-904-8348. You may also request a written copy from Marketing at One Tower Square, 2GSA, Hartford, Connecticut 06183.







Insurer: The Standard Fire Insurance Company  
Flood Service Center PO Box 29103  
Shawnee Mission, KS 66201-1403

Policy Number  
**6010243059**

**FLOOD RESIDENTIAL CONDO BUILDING ASSOCIATION POLICY DECLARATION - RENEWAL**

Named Insured and Mailing Address:  <b>BELLE MEADE CONDO ASSOCIATION 105 LEAKE AVE NASHVILLE, TN 37205-3710</b>	Policy Period: <b>05/07/2009 to 05/07/2010</b> Policy Term: <b>ONE YEAR</b>
	Agent No: <b>0F5881</b> <b>ROBINS INSURANCE AGENCY INC</b> <b>PO BOX 150437</b> <b>NASHVILLE, TN 37215</b> Agent Phone: <b>615-665-9200</b>
Payor: <b>INSURED</b>	

The building covered by this policy is located at the above mailing address unless otherwise stated below.

RATING DESCRIPTION	
Property/Building  <b>OTHER RESIDENTIAL THREE OR MORE FLOORS NO BASEMENT HIGH RISE CONDOMINIUM 61 UNITS</b>	Contents Location  <b>LOWEST FLOOR ONLY ABOVE GROUND LEVEL AND HIGHER FLOORS Subject to, III. Property Covered, Paragraph B.</b>

REPLACEMENT COST: \$9,723,688

Date of construction or substantial improvement was on 01/01/1965

LOCATION INFORMATION
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Community Name: **NASHVILLE & DAVIDSON COUNTY, CITY OF\*** No: **4700400326F**

Status: **REGULAR** CRS Class: **8** FIRM Zone: **AE** Elevation Difference:

COVERAGE AND RATING INFORMATION					
Coverage Type	Coverage Limit	Deductible	Rate	Deductible Adjustment	Premium
Building	\$ 500,000	\$10,000	00.85/00.19	\$ -310.00	\$ 1,630.00
Contents	\$ 10,000	\$10,000	00.96/00.97	\$ -15.00	\$ 81.00
ICC PREMIUM					\$ 75.00
ANNUAL SUBTOTAL					\$ 1,786.00
CRS DISCOUNT					\$ -179.00
FEDERAL POLICY FEE					\$ 735.00
TOTAL PREMIUM					\$ 2,342.00

**THIS IS NOT A BILL**

Policy Changes:

Attachments:  
FD0004 (05-03)

FIRST MORTGAGEE

SUNTRUST MORTGAGE INC ISAOA  
PO BOX 57028  
IRVINE, CA 92619-7028

LOAN NUMBER: 0021729504

Issue Date: 07/29/2010

Insured Copy

Your Insurer is The Standard Fire Insurance Company, One Tower Square, Hartford, CT 06183

For information about how Travelers compensates independent agents and brokers, please visit [www.Travelers.com](http://www.Travelers.com) or call our toll free telephone number 1-866-904-8348. You may also request a written copy from Marketing at One Tower Square, 2GSA, Hartford, Connecticut 06183.





Insurer: The Standard Fire Insurance Company  
Flood Service Center PO Box 29103  
Shawnee Mission, KS 66201-1403

Policy Number  
6010243059

# FLOOD RESIDENTIAL CONDO BUILDING ASSOCIATION POLICY DECLARATION - RENEWAL

Named Insured and Mailing Address:  <b>BELLE MEADE CONDO ASSOCIATION 105 LEAKE AVE NASHVILLE, TN 37205-3710</b>	Policy Period: 05/07/2010 to 05/07/2011 Policy Term: ONE YEAR
Payor: INSURED	Agent No: 0F5881 ROBINS INSURANCE AGENCY INC PO BOX 150437 NASHVILLE, TN 37215 Agent Phone: 615-665-9200

The building covered by this policy is located at the above mailing address unless otherwise stated below.

RATING DESCRIPTION	
Property/Building	Contents Location
OTHER RESIDENTIAL THREE OR MORE FLOORS NO BASEMENT HIGH RISE CONDOMINIUM 61 UNITS	LOWEST FLOOR ONLY ABOVE GROUND LEVEL AND HIGHER FLOORS Subject to, III. Property Covered, Paragraph B.

REPLACEMENT COST: \$9,723,688

Date of construction or substantial improvement was on 01/01/1965

## LOCATION INFORMATION

Community Name: NASHVILLE & DAVIDSON COUNTY, CITY OF No: 4700400326F

Status: REGULAR CRS Class: 8 FIRM Zone: AE Elevation Difference: Grandfathered:

COVERAGE AND RATING INFORMATION					
Coverage Type	Coverage Limit	Deductible	Rate	Deductible Adjustment	Premium
Building	\$ 500,000	\$10,000	00.95/00.21	\$ -304.00	\$ 1,867.00
Contents	\$ 10,000	\$10,000	00.96/00.71	\$ -13.00	\$ 83.00
ICC PREMIUM					\$ 75.00
ANNUAL SUBTOTAL					\$ 2,025.00
CRS DISCOUNT					\$ -203.00
FEDERAL POLICY FEE					\$ 840.00
TOTAL PREMIUM					\$ 2,662.00

THIS IS NOT A BILL

Policy Changes:

Attachments:  
FD0004 (05-03)

Issue Date: 07/30/2010

### Agent Copy

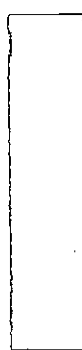
Your Insurer Is The Standard Fire Insurance Company, One Tower Square, Hartford, CT 06183

For information about how Travelers compensates independent agents and brokers, please visit [www.Travelers.com](http://www.Travelers.com) or call our toll free telephone number 1-866-904-8348. You may also request a written copy from Marketing at One Tower Square, 2GSA, Hartford, Connecticut 06183.

STATE OF TENNESSEE  
DEPARTMENT OF COMMERCE AND INS  
500 JAMES ROBERTSON PARKWAY  
NASHVILLE, TENNESSEE 37243

7010 2780 0001 2571 2382

10-20-2011 10:00 AM



7010 2780 0001 2571 2382 04/04/2011  
METLIFE INSURANCE CO OF CONNECTICUT  
800 S. GAY STREET, STE 2021, % C T CORP.  
KNOXVILLE, TN 37929-8710



CORPORATION SERVICE COMPANY®

## Notice of Service of Process

S1C / ALL  
Transmittal Number: 8625978  
Date Processed: 04/11/2011

Primary Contact: Pamela Hoff  
The Travelers Companies, Inc.  
385 Washington Street, MC 515A  
Saint Paul, MN 55102

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Entity:	The Standard Fire Insurance Company Entity ID Number 2317464
Entity Served:	The Standard Fire Insurance Company
Title of Action:	Belle Meade Tower Condominium Association vs. Bruce C. Robins
Document(s) Type:	Summons/Complaint
Nature of Action:	Contract
Court/Agency:	Davidson County Chancery Court, Tennessee
Case/Reference No:	11-404-IV
Jurisdiction Served:	Tennessee
Date Served on CSC:	04/11/2011
Answer or Appearance Due:	30 Days
Originally Served On:	Travelers
How Served:	Client Direct
Sender Information:	J. David Wicker, Jr. 615-383-0500

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Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**  
*CSC is SAS70 Type II certified for its Litigation Management System.*  
2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | [sop@cscinfo.com](mailto:sop@cscinfo.com)

**Service of Process  
Transmittal**

04/07/2011

CT Log Number 518317758

**TO:** Kalper Wilson  
Met Life  
1096 Avenue of the Americas  
New York, NY 10016-6796

**RE:** Process Served in Tennessee

**FOR:** MetLife Insurance Company of Connecticut (Domestic State: CT)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

<b>TITLE OF ACTION:</b>	Belle Meade Tower Condominium Association, PLLC, vs. Bruce C. Robins, et al., Dfcs. // To: MetLife Insurance Co of Connecticut <i>Name discrepancy noted.</i>
<b>DOCUMENT(S) SERVED:</b>	Letter, Summons, Return Form, Complaint, Exhibit(s)
<b>COURT/AGENCY:</b>	Davidson County Chancery Court, TN Case # 11-404 JV
<b>NATURE OF ACTION:</b>	Insurance Litigation - Policy benefits claimed for property damage as a result of flood on 5/3/10
<b>ON WHOM PROCESS WAS SERVED:</b>	C T Corporation Systems, Knoxville, TN
<b>DATE AND HOUR OF SERVICE:</b>	By Certified Mail on 04/07/2011 postmarked on 04/04/2011
<b>JURISDICTION SERVED:</b>	Tennessee
<b>APPEARANCE OR ANSWER DUE:</b>	Within 30 days from the date this summons is served upon you
<b>ATTORNEY(S) / DEMAND(S):</b>	J. David Wicker, Jr. Corbett Crockett 3100 West End Avenue Suite 1050 Nashville, TN 37203 615-383-0500
<b>REMARKS:</b>	Papers were served by the Department of Commerce and Insurance on 3/30/11.
<b>ACTION ITEMS:</b>	CT has retained the current log, Retain Date: 04/07/2011, Expected Purge Date: 04/12/2011 Image SOP Email Notification: CTServiceofProcess ctserviceofprocess@metlife.com
<b>SIGNED:</b>	C T Corporation System
<b>PER:</b>	Amy McLaren
<b>ADDRESS:</b>	800 S. Gay Street Suite 0221 Knoxville, TN 37929-9710
<b>TELEPHONE:</b>	800-592-9023

Page 1 of 1 / WT

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the amount due, or any information contained in the documents themselves. Recipient is responsible for maintaining said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

**STATE OF TENNESSEE**  
**Department of Commerce and Insurance**  
**500 James Robertson Parkway**  
**Nashville, TN 37243-1131**  
**PH - 615.532.5260, FX - 615.532.2788**  
**brenda.meade@tn.gov**

April 4, 2011

Metlife Insurance Co Of Connecticut  
800 S. Gay Street, Ste 2021, % C T Corp.  
Knoxville, TN 37929-9710  
NAIC # 87726

Certified Mail  
Return Receipt Requested  
7010 2780 0001 2571 2382  
Cashier # 2559

Re: Belle Meade Tower Condo. Asso. V. Metlife Insurance Co Of Connecticut

Docket # 11-404-I V

To Whom It May Concern:

Pursuant to Tennessee Code Annotated § 56-2-504 or § 56-2-506, the Department of Commerce and Insurance was served March 30, 2011, on your behalf in connection with the above-styled proceeding. Documentation relating to the subject is herein enclosed.

Brenda C. Meade  
Designated Agent  
Service of Process

Enclosures

cc: Chancery Court Clerk  
Davidson County  
One Public Square, Suite 308  
Nashville, Tn 37201

STATE OF TENNESSEE 20 <sup>TH</sup> JUDICIAL DISTRICT CHANCERY COURT	<b>SUMMONS</b>	CASE FILE NUMBER <div style="font-size: 1.5em; font-family: cursive;">11-404-11</div>
<b>PLAINTIFF</b>  BELLE MEADE TOWER CONDOMINIUM ASSOCIATION		<b>DEFENDANT</b>  BRUCE C. ROBINS, ROBINS INSURANCE AGENCY, INC., and TRAVELERS INSURANCE COMPANY
<div style="display: flex; justify-content: space-between;"> <div> <b>TO: (NAME AND ADDRESS OF DEFENDANT)</b>             TRAVELERS INSURANCE COMPANY, with service through            Department of Commerce and Insurance - Commissioner            500 James Robertson Parkway, 5<sup>th</sup> Floor            Nashville, TN 37243         </div> <div> <b>Method of Service:</b>   <div style="display: flex; flex-direction: column; gap: 5px;"> <div>G Certified Mail</div> <div>G Davidson Co. Sheriff</div> <div>G *Comm. Of Insurance</div> <div>G *Secretary of State</div> <div>G *Out of County Sheriff</div> <div>G Private Process Server</div> <div>G Other</div> </div> </div> </div> <div style="margin-top: 10px;">       List each defendant on a separate summons.       <div style="float: right;">*Attach Required Fees</div> </div>		
<p><b>YOU ARE SUMMONED TO DEFEND A CIVIL ACTION FILED AGAINST YOU IN CHANCERY COURT, DAVIDSON COUNTY, TENNESSEE. YOUR DEFENSE MUST BE MADE WITHIN THIRTY (30) DAYS FROM THE DATE THIS SUMMONS IS SERVED UPON YOU. YOU MUST FILE YOUR DEFENSE WITH THE CLERK OF THE COURT AND SEND A COPY TO THE PLAINTIFF'S ATTORNEY AT THE ADDRESS LISTED BELOW. IF YOU FAIL TO DEFEND THIS ACTION BY THE ABOVE DATE, JUDGMENT BY DEFAULT CAN BE RENDERED AGAINST YOU FOR THE RELIEF SOUGHT IN THE COMPLAINT.</b></p>		
<b>Attorney for plaintiff or plaintiff if filing Pro Se:</b> (Name, address & telephone number)  J. David Wicker, Jr. W. Lee Corbett CORBETT CROCKETT 3100 West End Avenue, Suite 1050 Nashville, Tennessee 37203 (615) 383-0500	<div style="display: flex; justify-content: space-between;"> <div> <b>FILED, ISSUED &amp; ATTESTED</b>             CRISTI SCOTT, Clerk and Master            By:           <div style="margin-left: 20px;">             1 Public Square              Suite 308              Nashville, TN 37201           </div> </div> <div style="text-align: right;"> <div style="font-size: 1.2em; font-family: cursive;">MAR 24 2011</div>              Deputy Clerk &amp; Master         </div> </div>	
<b>NOTICE OF DISPOSITION DATE</b>		
<p>The disposition date of this case is twelve months from date of filing. The case must be resolved or set for trial by this date or it will be dismissed by the Court for failure to prosecute pursuant to T.R.C.P. 41.02 and Local Rule 18.</p> <p>If you think the case will require more than one year to resolve or set for trial, you must send a letter to the Clerk and Master at the earliest practicable date asking for an extension of the disposition date and stating your reasons. Extensions will be granted only when exceptional circumstances exist.</p>		
<b>TO THE SHERIFF:</b>	<b>DATE RECEIVED</b>   <div style="border-top: 1px solid black; padding-top: 5px;"> <b>Sheriff</b> </div>	

\*\*\*Submit one original plus one copy for each defendant to be served.

ADA Coordinator, Cristi Scott (862-5710)

**RETURN ON SERVICE OF SUMMONS**

I hereby return this summons as follows: (Name of Party Served) \_\_\_\_\_

☐ Served \_\_\_\_\_☐ Not Found \_\_\_\_\_☐ Not Served \_\_\_\_\_☐ Other \_\_\_\_\_

DATE OF RETURN: \_\_\_\_\_

By: \_\_\_\_\_

Sheriff/or other authorized person to serve process

**RETURN ON SERVICE OF SUMMONS BY MAIL**

I hereby certify and return that on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I sent, postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in case \_\_\_\_\_ to the defendant \_\_\_\_\_. On the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I received the return receipt, which had been signed by \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

The return receipt is attached to this original summons to be filed by the Chancery Court Clerk &amp; Master.

Sworn to and subscribed before me on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Signature of \_\_\_\_\_ Notary Public or \_\_\_\_\_ Deputy Clerk

Signature of plaintiff, plaintiff's attorney or other person authorized by statute to serve process.

My Commission Expires: \_\_\_\_\_

**NOTICE OF PERSONAL  
PROPERTY EXEMPTION****TO THE DEFENDANT(S):**

Tennessee law provides a ten thousand dollar (\$10,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

Mail list to: Clerk & Master  
1 Public Square  
Suite 308  
Nashville TN 37201

Please state file number on list.

ATTACH  
RETURN  
RECEIPT  
HERE  
(IF APPLICABLE)

**CERTIFICATION (IF APPLICABLE)**

I, Cristi Scott, Clerk & Master of the Chancery Court in the State of Tennessee, Davidson County, do certify this to be a true and correct copy of the original summons issued in this case.

CRISTI SCOTT, Clerk &amp; Master

By: \_\_\_\_\_

D.C. &amp; M.



STATE OF TENNESSEE 20 <sup>TH</sup> JUDICIAL DISTRICT CHANCERY COURT		<b>SUMMONS</b> <span style="font-size: 2em; font-weight: bold; color: red;">ORIGINAL</span>		CASE FILE NUMBER <div style="font-size: 1.5em; font-family: cursive;">11-404-TV</div>	
PLAINTIFF  BELLE MEADE TOWER CONDOMINIUM ASSOCIATION			DEFENDANT  BRUCE C. ROBINS, ROBINS INSURANCE AGENCY, INC., and TRAVELERS INSURANCE COMPANY		
<div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <b>TO: (NAME AND ADDRESS OF DEFENDANT)</b>             BRUCE C. ROBINS            30 Burton Hills Blvd            Nashville, TN 37215         </div> <div style="width: 35%;"> <b>Method of Service:</b>   <input type="checkbox"/> Certified Mail  <input type="checkbox"/> Davidson Co. Sheriff  <input type="checkbox"/> *Comm. Of Insurance  <input type="checkbox"/> *Secretary of State  <input type="checkbox"/> *Out of County Sheriff  <input type="checkbox"/> Private Process Server  <input type="checkbox"/> Other         </div> </div> <p style="font-size: 0.8em; margin-top: 10px;">List each defendant on a separate summons. <span style="float: right;">*Attach Required Fees</span></p>					
<p><b>YOU ARE SUMMONED TO DEFEND A CIVIL ACTION FILED AGAINST YOU IN CHANCERY COURT, DAVIDSON COUNTY, TENNESSEE. YOUR DEFENSE MUST BE MADE WITHIN THIRTY (30) DAYS FROM THE DATE THIS SUMMONS IS SERVED UPON YOU. YOU MUST FILE YOUR DEFENSE WITH THE CLERK OF THE COURT AND SEND A COPY TO THE PLAINTIFF'S ATTORNEY AT THE ADDRESS LISTED BELOW. IF YOU FAIL TO DEFEND THIS ACTION BY THE ABOVE DATE, JUDGMENT BY DEFAULT CAN BE RENDERED AGAINST YOU FOR THE RELIEF SOUGHT IN THE COMPLAINT.</b></p>					
<b>Attorney for plaintiff or plaintiff if filing Pro Se:</b> <small>(Name, address &amp; telephone number)</small>  J. David Wicker, Jr. W. Lee Corbett CORBETT CROCKETT 3100 West End Avenue, Suite 1050 Nashville, Tennessee 37203 (615) 383-0500			<div style="display: flex; justify-content: space-between;"> <div> <b>FILED, ISSUED &amp; ATTESTED</b>           CRISTI SCOTT, Clerk and Master          By: <span style="float: right;">1 Public Square Suite 308 Nashville, TN 37201</span> </div> <div style="text-align: right;"> <div style="font-size: 1.2em; font-weight: bold;">MAR 24 2011</div>   </div> </div> <p style="text-align: right; font-size: 0.8em;">Deputy Clerk &amp; Master</p>		
<b>NOTICE OF DISPOSITION DATE</b>					
<p>The disposition date of this case is twelve months from date of filing. The case must be resolved or set for trial by this date or it will be dismissed by the Court for failure to prosecute pursuant to T.R.C.P. 41.02 and Local Rule 18.</p> <p>If you think the case will require more than one year to resolve or set for trial, you must send a letter to the Clerk and Master at the earliest practicable date asking for an extension of the disposition date and stating your reasons. Extensions will be granted only when exceptional circumstances exist.</p>					
<b>TO THE SHERIFF:</b>			<b>DATE RECEIVED</b>   <hr/> <b>Sheriff</b>		

\*\*\*Submit one original plus one copy for each defendant to be served.

ADA Coordinator, Cristi Scott (862-5710)

# RETURN ON SERVICE OF SUMMONS

I hereby return this summons as follows: (Name of Party Served) \_\_\_\_\_

- ☐ Served \_\_\_\_\_ ☐ Not Found \_\_\_\_\_  
☐ Not Served \_\_\_\_\_ ☐ Other \_\_\_\_\_

DATE OF RETURN:

By:

Sheriff or other authorized person to serve process

## RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return that on the 24 day of March, 2011, I sent, postage prepaid by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in case 11-104- to the defendant Bruce C. Robins. On the 28 day of March, 2011, I received the return receipt, which had been signed by Bruce Robins on the 26 day of March. The return receipt is attached to this original summons to be filed by the Chancery Court Clerk & Master.

Sworn to and subscribed before me on this 25 day of March, 2011.

Signature of \_\_\_\_\_ Notary Public or \_\_\_\_\_ Deputy Clerk  
 My Commission Expires July 1, 2014

Signature of plaintiff, plaintiff's attorney or other person authorized by statute to serve process

TO THE DEFENDANT(S):

Tennessee law provides a ten thousand dollar exemption from seizure of a debtor's equity interest in personal property to satisfy a judgment. If a judgment is entered against you in this action and you wish to claim this exemption, you must file a written list, under oath, of the items you wish to exempt with the clerk of the court. The list may be changed by you thereafter as necessary before the judgment becomes final. Items exempt from execution or garnishment issued prior to the judgment are automatically exempt by law. These include items of necessary wear and your family and trunks or other receptacles containing such apparel, family portraits, the family Bible, and other items of sentimental value. Should any of these items be seized by the creditor, you may wish to seek the return of the items.

Mail list to: Clerk & Master  
 1 Public Square  
 Suite 308  
 Nashville TN 37201

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Bruce C. Robins, Registered Agent  
Robins Insurance Agency, Inc.  
30 Burton Hills Blvd.  
Nashville, TN 37215  
Restricted Delivery  
Postage: \$10.04

2. Article Number \_\_\_\_\_  
 (Transfer from service label)

A. Signature <u>X</u> <u>[Signature]</u>		<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
B. Received by (Printed Name) <u>B. Robins</u>		C. Date of Delivery <u>03-26</u>
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No		
3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D.		
4. Restricted Delivery? (Extra Fee) <input checked="" type="checkbox"/> Yes		

7011 0110 0001 9804 2593

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-11-1540

### CERTIFICATION (IF APPLICABLE)

I, Cristi Scott, Clerk & Master of the Chancery Court in the State of Tennessee, Davidson County, do certify this to be a true and correct copy of the original summons issued in this case.

CRISTI SCOTT, Clerk & Master

By:

D.C. & M.

STATE OF TENNESSEE 20 <sup>TH</sup> JUDICIAL DISTRICT CHANCERY COURT	<div style="display: flex; justify-content: space-between;"> <span><b>SUMMONS</b></span> <span style="font-size: 2em; font-weight: bold; opacity: 0.5;">ORIGINAL</span> </div> <div style="text-align: right;">           FILE NUMBER            11-4104-14         </div>
<b>PLAINTIFF</b>  BELLE MEADE TOWER CONDOMINIUM ASSOCIATION	<b>DEFENDANT</b>  BRUCE C. ROBINS, ROBINS INSURANCE AGENCY, INC., and TRAVELERS INSURANCE COMPANY
<div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <b>TO: (NAME AND ADDRESS OF DEFENDANT)</b>             BRUCE C. ROBINS, Registered Agent for            ROBINS INSURANCE AGENCY, INC.            30 Burton Hills Blvd            Nashville, TN 37215         </div> <div style="width: 35%;"> <b>Method of Service:</b>  <input checked="" type="checkbox"/> Certified Mail  <input type="checkbox"/> Davidson Co. Sheriff  <input type="checkbox"/> *Comm. Of Insurance  <input type="checkbox"/> *Secretary of State  <input type="checkbox"/> *Out of County Sheriff  <input type="checkbox"/> Private Process Server  <input type="checkbox"/> Other         </div> </div> <p>List each defendant on a separate summons. <span style="float: right;">*Attach Required Fees</span></p>	
<p><b>YOU ARE SUMMONED TO DEFEND A CIVIL ACTION FILED AGAINST YOU IN CHANCERY COURT, DAVIDSON COUNTY, TENNESSEE. YOUR DEFENSE MUST BE MADE WITHIN THIRTY (30) DAYS FROM THE DATE THIS SUMMONS IS SERVED UPON YOU. YOU MUST FILE YOUR DEFENSE WITH THE CLERK OF THE COURT AND SEND A COPY TO THE PLAINTIFF'S ATTORNEY AT THE ADDRESS LISTED BELOW. IF YOU FAIL TO DEFEND THIS ACTION BY THE ABOVE DATE, JUDGMENT BY DEFAULT CAN BE RENDERED AGAINST YOU FOR THE RELIEF SOUGHT IN THE COMPLAINT.</b></p>	
<b>Attorney for plaintiff or plaintiff if filing Pro Se:</b> (Name, address & telephone number)  J. David Wicker, Jr. W. Lee Corbett CORBETT CROCKETT 3100 West End Avenue, Suite 1050 Nashville, Tennessee 37203 (615) 383-0500	<div style="border-bottom: 1px solid black; padding-bottom: 5px;"> <b>FILED, ISSUED &amp; ATTESTED</b>   <div style="text-align: right; font-weight: bold;">MAR 24 2011</div> </div> <div style="padding-top: 10px;"> <b>CRISTI SCOTT, Clerk and Master</b>          By: <span style="float: right;">1 Public Square Suite 308 Nashville, TN 37201</span> </div> <div style="text-align: right; margin-top: 20px;"> </div> <div style="text-align: right; margin-top: 10px;">         Deputy Clerk &amp; Master       </div>
<b>NOTICE OF DISPOSITION DATE</b>	
<p>The disposition date of this case is twelve months from date of filing. The case must be resolved or set for trial by this date or it will be dismissed by the Court for failure to prosecute pursuant to T.R.C.P. 41.02 and Local Rule 18.</p> <p>If you think the case will require more than one year to resolve or set for trial, you must send a letter to the Clerk and Master at the earliest practicable date asking for an extension of the disposition date and stating your reasons. Extensions will be granted only when exceptional circumstances exist.</p>	
<b>TO THE SHERIFF:</b>	<b>DATE RECEIVED</b>   <div style="border-top: 1px solid black; padding-top: 5px;"> <b>Sheriff</b> </div>

\*\*\*Submit one original plus one copy for each defendant to be served.

ADA Coordinator, Cristi Scott (862-5710)

# RETURN ON SERVICE OF SUMMONS

I hereby return this summons as follows: (Name of Party Served) \_\_\_\_\_

☐ Served \_\_\_\_\_  
☐ Not Served \_\_\_\_\_

☐ Not Found \_\_\_\_\_  
☐ Other \_\_\_\_\_

DATE OF RETURN:

By:

Sheriff or other authorized person to serve process

## RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return that on the 24 day of MARCH, 2011, I sent, postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in case 11-40711 to the defendant Robins Insurance Guy. On the 28 day of MARCH, 2011, I received the return receipt, which had been signed by Bruce C. Robins on the 26 day of MARCH, 2011. The return receipt is attached to this original summons to be filed by the Chancery Court Clerk & Master.

Sworn to and subscribed before me on this 24 day of MARCH, 2011.  
 Signature of [Signature] Notary Public, State of Tennessee  
 My Commission Expires: July 7, 2014

Signature of plaintiff, plaintiff's attorney or other person authorized by statute to serve process.

NOTICE OF PERSONAL PROPERTY EXEMPTION

### TO THE DEFENDANT(S):

Tennessee law provides a debtor's equity interest personal property is exempt from seizure to satisfy a judgment. If you wish to file a written list, under oath, with the clerk of the court. This list will be changed by you thereafter before the judgment becomes execution or garnishment issued. These items are automatically exempt and your family and trunks or such apparel, family portraits, etc. Should any of these items be seized, you may wish to set

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
Bruce C. Robins  
30 Burton Hills Blvd.  
Nashville, TN 37215  
Restricted Delivery  
Postage: \$10.99

Mail list to: Clerk & Master  
 1 Public Square  
 Suite 308  
 Nashville TN 3

2. Article Number  
 (Transfer from service label)

A. Signature <u>[Signature]</u>		<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
B. Received by (Printed Name) <u>B. C. Robins</u>	C. Date of Delivery <u>03-26</u>	
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No		
3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D. <input type="checkbox"/> Yes		
4. Restricted Delivery? (Extra Fee) <input checked="" type="checkbox"/> Yes		

7011 0110 8003 9804 2586

Please state file number on list.

PS Form 3811, February 2004

Domestic Return Receipt

102502-02-44-1540

### CERTIFICATION (IF APPLICABLE)

I, Cristi Scott, Clerk & Master of the Chancery Court in the State of Tennessee, Davidson County, do certify this to be a true and correct copy of the original summons issued in this case.

CRISTI SCOTT, Clerk & Master

By:

D.C. & M.

# ORIGINAL

STATE OF TENNESSEE 20 <sup>TH</sup> JUDICIAL DISTRICT CHANCERY COURT		<b>SUMMONS</b>		CASE FILE NUMBER <i>11-404-IV</i>	
PLAINTIFF  BELLE MEADE TOWER CONDOMINIUM ASSOCIATION			DEFENDANT  BRUCE C. ROBINS, ROBINS INSURANCE AGENCY, INC., and TRAVELERS INSURANCE COMPANY		
TO: (NAME AND ADDRESS OF DEFENDANT)					
TRAVELERS INSURANCE COMPANY, with service through Department of Commerce and Insurance - Commissioner 500 James Robertson Parkway, 5 <sup>th</sup> Floor Nashville, TN 37243				Method of Service:  G Certified Mail G Davidson Co. Sheriff G *Comm. Of Insurance G *Secretary of State G *Out of County Sheriff G Private Process Server G Other  *Attach Required Fees	
List each defendant on a separate summons.					
<b>YOU ARE SUMMONED TO DEFEND A CIVIL ACTION FILED AGAINST YOU IN CHANCERY COURT, DAVIDSON COUNTY, TENNESSEE. YOUR DEFENSE MUST BE MADE WITHIN THIRTY (30) DAYS FROM THE DATE THIS SUMMONS IS SERVED UPON YOU. YOU MUST FILE YOUR DEFENSE WITH THE CLERK OF THE COURT AND SEND A COPY TO THE PLAINTIFF'S ATTORNEY AT THE ADDRESS LISTED BELOW. IF YOU FAIL TO DEFEND THIS ACTION BY THE ABOVE DATE, JUDGMENT BY DEFAULT CAN BE RENDERED AGAINST YOU FOR THE RELIEF SOUGHT IN THE COMPLAINT.</b>					
Attorney for plaintiff or plaintiff if filing Pro Se: (Name, address & telephone number)  J. David Wicker, Jr. W. Lee Corbett CORBETT CROCKETT 3100 West End Avenue, Suite 1050 Nashville, Tennessee 37203 (615) 383-0500			FILED, ISSUED & ATTESTED <b>MAR 24 2011</b>  CRISTI SCOTT, Clerk and Master By: <i>[Signature]</i> 1 Public Square Suite 308 Nashville, TN 37201  Deputy Clerk & Master		
<b>NOTICE OF DISPOSITION DATE</b>					
The disposition date of this case is twelve months from date of filing. The case must be resolved or set for trial by this date or it will be dismissed by the Court for failure to prosecute pursuant to T.R.C.P. 41.02 and Local Rule 18.  If you think the case will require more than one year to resolve or set for trial, you must send a letter to the Clerk and Master at the earliest practicable date asking for an extension of the disposition date and stating your reasons. Extensions will be granted only when exceptional circumstances exist.					
<b>TO THE SHERIFF:</b>			<b>DATE RECEIVED</b>		
			Sheriff		

\*\*\*Submit one original plus one copy for each defendant to be served.

ADA Coordinator, Cristi Scott (862-5710)

# RETURN ON SERVICE OF SUMMONS

I hereby return this summons as follows: (Name of Party Served) Commissioner of Insurance

☒ Served 3/30/11

☐ Not Served

☐ Not Found Insurance

☐ Other

DATE OF RETURN:

3/30/11

By: Christy Daniel

Sheriff or other authorized person to serve process

## RETURN ON SERVICE OF SUMMONS BY MAIL Special Officer

I hereby certify and return that on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I sent, postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in case \_\_\_\_\_ to the defendant \_\_\_\_\_. On the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I received the return receipt, which had been signed by \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

The return receipt is attached to this original summons to be filed by the Chancery Court Clerk & Master.

Sworn to and subscribed before me on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Signature of \_\_\_\_\_ Notary Public or Deputy Clerk

Signature of plaintiff, plaintiff's attorney or other person authorized by statute to serve process.

My Commission Expires:

### NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S):

Tennessee law provides a ten thousand dollar (\$10,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

Mail list to: Clerk & Master  
1 Public Square  
Suite 308  
Nashville TN 37201

Please state file number on list.

ATTACH  
RETURN  
RECEIPT  
HERE  
(IF APPLICABLE)

### CERTIFICATION (IF APPLICABLE)

I, Cristi Scott, Clerk & Master of the Chancery Court in the State of Tennessee, Davidson County, do certify this to be a true and correct copy of the original summons issued in this case.

CRISTI SCOTT, Clerk & Master

By:

D.C. & M.